

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: ABBOTT LABORATORIES, ET AL.,
PRETERM INFANT NUTRITION
PRODUCTS LIABILITY LITIGATION**

MDL No. 3026

Master Docket No. 1:22-cv-00071

This Document Relates to:

Case No. 1:22-cv-05356

***Keosha Diggs, Individually and as Parent and
General Guardian of K.B., a minor v. Abbott
Laboratories, et al.***

Hon. Rebecca R. Pallmeyer

JURY DEMAND

ABBOTT'S WITNESS LIST

Pursuant to the Parties' agreed scheduling stipulation, Abbott Laboratories identifies the following witnesses (including experts) it may call at trial.

I. Abbott Witnesses

- a. Hakim Bouzamondo
- b. Rachael Buck
- c. Christopher Calamari
- d. Amie Heap
- e. Robyn Spilker
- f. Fabrizis Suarez
- g. Clarissa Willis

II. Third Party Witnesses

- a. Abebe Elias
- b. Jeannie Chun
- c. Dina E. El-Metwally

III. Expert Witnesses

- a. Brigit Carter
- b. Pradeep Chintagunta
- c. John Lucey
- d. Carolina Cerezo
- e. Camilia Martin
- f. Brian Smith
- g. Amanda Starc
- h. John Wallingford
- i. Alex Williamson

IV. Other Witnesses

a. Keosha Diggs

Abbott also incorporates by reference Plaintiff's witness list and reserves the right to call anyone identified therein, including any experts. Abbott also reserves the right to supplement, alter, or amend this witness list for any reason, including based upon as-yet untaken depositions, any rulings of the Court, or any other Court decisions that affect the scope of evidence in this trial, or if any party alters or amends their witness list. In particular, Abbott reserves the right to call live any witness for which it has currently designated deposition testimony, based on rulings of this Court. By reserving the right to call witnesses identified by other parties, and identifying the witnesses above, Abbott does not intend to waive any objections to deposition testimony, live testimony, exhibits or other evidence or argument.

Abbott further reserves the right to call any of the treating physicians or other health care providers of K.B. or Ms. Diggs should their testimony become necessary at trial. Abbott also anticipates calling one or more impeachment witnesses at trial and will identify such witnesses at the appropriate time at trial. Abbott further reserves the right to supplement this list and/or to elicit testimony from witnesses not identified herein, depending upon the evidence adduced at trial and/or in response to testimony provided by other party witnesses. Abbott further reserves the right to call any of the above witnesses or any other witnesses for rebuttal purposes, or in the punitive phase of the trial if a punitive phase is even allowed and/or necessary.

Abbott also reserves the right to supplement this witness list and call additional witnesses not included on this list who become known to Abbott in response to or in furtherance of issues not currently apparent. Abbott also reserves the right to supplement this list with witnesses who may be identified in future discovery as having relevant information and/or knowledge. Abbott also reserves the right to call necessary document custodian witnesses to authenticate records, to the extent they are not covered by the parties' stipulation regarding documents.

Abbott also reserves the right to supplement this witness list to include witnesses whose depositions are taken hereafter or for which transcripts have not yet been received. This witness list does not include those witnesses for whom Abbott would seek to introduce designations of prior testimony if Plaintiff seeks to introduce prior testimony from the same witness. Lastly, Abbott also reserves the right to present additional witnesses at trial by deposition, wherein deposition designations will be submitted.

Dated: July 23, 2025

Respectfully submitted,

/s/ James F. Hurst

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